UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

Ronnie Worthen,

Plaintiff,

v.

Defenders, Inc. d/b/a Protect Your Home,

Defendant.

Civil Action No.: 1:16-cv -03508-KAM-RLM

US DISTRICT COURT E.D.N.Y.

OCT 1 2 2016

BROOKLYN OFFICE

STIPULATION OF DISMISSAL

WHEREAS, the parties to the above-entitled action have resolved the issues alleged in the Complaint in this action, and have negotiated in good faith for that purpose; and

WHEREAS, none of the parties to the above-captioned action is an infant or incompetent person; and

WHEREAS, the parties in the above-captioned action wish to discontinue the litigation.

IT IS HEREBY STIPULATED AND AGREED by and between the parties and/or their respective counsel as follows that, pursuant to FRCP 41(a)(1)(A)(ii), the above-captioned action is hereby dismissed in its entirety with prejudice and without costs to any party. The Court will retain jurisdiction to enforce the terms of the settlement agreement.

Ronnie Worthen

Defenders, Inc. d/b/a Protect Your Home

/s/ Sergei Lemberg

Sergei Lemberg, Esq. (SL 6331)

LEMBERG LAW, L.L.C.

43 Danbury Road, 3rd Floor

Wilton, CT 06897 (203) 653-2250

SO ORDERED

Attorney for Plaintiff

s/KAM

10/12/2016

/s/ Michael J. Forino

Michael J. Forino, Esq. ARCHER & GREINER, P.C. 44 Wall Street, 13th Floor New York, NY 10005 (201) 498-8529 Attorney for Defendant